

ORIGINAL

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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MAR 4 1996

Amendment of Part 90 of the
Commission's Rules to Facilitate
Future Development of SMR Systems
In the 800 MHz Frequency Band

DOCKET FILE COPY DUPLICATE
) PR Docket No. 93-146
) GN Docket No. 93-252
) PP Docket No. 93-253
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

REPLY COMMENTS OF GENERAL MOTORS RESEARCH CORPORATION

General Motors Research Corporation ("GMRC"), a subsidiary of General Motors Corporation ("GM"), hereby files its reply to the initial comments filed by other parties on February 15, 1996, in the above-captioned proceeding.

In its initial comments, GMRC explained that it and another GM affiliate are licensees of 800 MHz trunked systems which use, at least in part, frequencies within the General Category of 800 MHz channels. GMRC described how GM's core manufacturing activities at its various plants will be affected adversely by any Commission decision which impairs the use of its licensed General Category channels for non-commercial private mobile radio service. GM's specialized requirements for reliable communications services in-plant, around-plant, and between-plants cannot be satisfied by commercial carriers.

GMRC endorses the initial comments of ITA and UTC which oppose re-allocation of the General Category channels to the SMR category in accordance with pre-determined Economic Area (EA) service areas and which describe how the Commission failed to

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provide a reasoned basis for the re-allocation.^{1/} As ITA and UTC point out, the reallocation will deprive non-commercial licensees of an important resource in developing and maintaining their essential private communications networks and will exacerbate the current scarcity of spectrum available for private non-commercial use.^{2/}

ITA and UTC accurately explain that the needs of private users do not track pre-defined geographic areas.^{3/} For example, GMRC's twenty-channel trunked 800 MHz system in Michigan (which GMRC described in its initial comments) was engineered, not on the basis of a predefined geographic area adopted to facilitate the Commission's auctioning processes, but on the real world basis of the actual locations of GM's Michigan manufacturing plants. GMRC supports the proposal of UTC that all General Category incumbents, including non-SMR incumbents, be allowed to modify their existing service areas without prior notification to the Commission as long as their 22 dBu interference contour is not expanded.^{4/}

^{1/} Comments of the Industrial Telecommunications Association, Inc. and the Telephone Maintenance Frequency Advisory Committee, at 5-8 ("ITA"); Comments of UTC, at 2-3 ("UTC").

^{2/} ITA at 6; UTC at 5.

^{3/} ITA at 8; UTC at 13.

^{4/} UTC at 15.

GMRC also supports the consensus among most parties, including both SMR and non-SMR interests,^{5/} that, even if the Commission affirms the re-allocation of the General Category channels to SMRs, the Commission should prohibit the mandatory relocation of non-SMR General Category incumbents. SMRs and non-SMRs have co-existed in the General Category Spectrum for more than two decades. A policy prohibiting mandatory relocation of non-SMR incumbents is required as a matter of both equity (because the Commission already has decided to prohibit the mandatory relocation of SMR General Category incumbents) and practical necessity (because in most areas no vacant channels suitable for relocation are available in designated non-SMR spectrum).


Finally, as pointed out in the initial comments of both GMRC and Consumers Power Company of Michigan, the Commission must take into consideration in any decision affecting the General Category channels the special circumstances that exist in the Canadian border region. Consumers Power Company explains that in the Canadian border areas the 150 General Category channels were divided among the SMR category and the three non-commercial categories (Industrial/Land Transportation, Business and Public Safety) and, therefore, that no General Category Channels exist in certain Canadian border areas.^{6/} Even if the Commission does

^{5/} ITA at 8; UTC at 15; American Mobile Telecommunications Association at 28; Duke Power Company at 12.

^{6/} Comments of Consumers Power Company, at 4-5.

not reconsider its decision to re-allocate the General Category Channels exclusively to SMR use -- a decision which GMRC and others urge the Commission to reconsider -- the Commission should clarify that the frequencies which correspond to General Category channels in other parts of the country cannot and have not been re-allocated to SMR in the Canadian border regions. The Commission should make clear that non-SMR incumbents on 800 MHz frequencies in the Canadian border regions will not be affected adversely by decisions in this docket.

Respectfully submitted
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March 1, 1996